

# **EXHIBIT E**

### **DEFENDANT DEPOSITION REFUSALS AND NO-SHOW**

Despite being properly noticed, the Defendants refused to show or postponed, without filing a protective order, for each of the following depositions.

- |                    |  |
|--------------------|--|
| February 23, 2018  | Plaintiff provided short notice for the deposition of Jennifer Voycheske because of her declaration attached to Defendants' Opposition to Plaintiff's Motion pursuant to Rule 12(b). Short notice was necessary to complete Plaintiff's Reply briefing in support of the Motion.         |
| March 14, 2018     | Noticed depositions of Ms. Voycheske and Steffen canceled due to death of defense counsel's mother-in-law on 48 hours notice. Two weeks of no discovery followed. As of August 17, 2018, neither witness has yet to be deposed.  |
| May 23, 2018       | After months attempting to schedule, Defendant Bisignano was noticed to be deposed on May 23. On less than 48 hours notice, deposition postponed due to injury of Bisignano's son the prior weekend.   |
| June 7&8, 2018     | Defendants refused to appear at properly noticed 30(b)(6) deposition. June 12 <sup>th</sup> hearing was held to compel. Motion to compel was denied. 30(b)(6) depositions subject of that June 12 <sup>th</sup> hearing still have not occurred or been scheduled as of August 17, 2018. |
| June 13, 2018      | Noticed deposition of Ms. Voycheske canceled after June 12 <sup>th</sup> hearing before Judge Bloom.   |
| June 22, 2018      | Adam Rosman was properly served notice of deposition to occur on June 22. Defense counsel refused to produce Mr. Rosman. Defendants did not seek protective order. Plaintiff appeared at the designated time and place. Mr. Rosman and First Data did not appear.                        |
| June 25, 2018      | <b>Defendants' noticed a third-party deposition of Ms. Julie Kelly to be held in Cincinnati on June 25. Ms. Kelly appeared at the designate time and place. Defense counsel did not appear at the desiognated time and place to take Ms. Kelly's deposition.</b>                         |
| July 3, 2018       | EJ Jackson was properly served notice of deposition to occur on July 3. Defense counsel refused to produce EJ Jackson. Defendants did not seek protective order. Plaintiff appeared at the designated time and place. Mr. Rosman and First Data did not appear.                          |
| July 30 & 31, 2018 | Noticed 30(b)(6) depositions were not held. Defense refused to produce witnesses at the designated time and place.   |

### **CALENDAR OF DISCOVERY DELAYS**

Attached are calendars for the fact discovery period noting significant events/non-events and delays.

# January 2018

Sun	Mon	Tue	Wed	Thu	Fri	Sat
	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	Day #153 18 FIRST DAY OF DISCOVERY	Day #154 19	Day #155 20
Day #156 21	Day #157 22	Day #158 23	Day #159 24	Day #160 25	Day #161 26	Day #162 27
Day #163 28	Day #164 29	Day #165 30	Day #166 31			

# February 2018

Sun	Mon	Tue	Wed	Thu	Fri	Sat
				Day #167 1	Day #168 2	Day #169 3
Day #170 4	Day #171 5	Day #172 6 PLAINTIFF SERVES 12(c) MOTION	Day #173 7	Day #174 8	Day #175 9	Day #176 10
Day #177 11	Day #178 12	Day #179 13	Day #180 14	Day #181 15	Day #182 16	Day #183 17
Day #184 18	Day #185 19	Day #186 20 DEFENDANT SERVES OPPOSITION TO PLAINTIFFS 12(c) MOTION Voycheske Declaration = new information	Day #187 21 BARGER STARTS DEPOSITION PROCESS Omaha Voycheske/Graesser Depo Noticed	Day #188 22	Day #189 23 DEPOSITIONS CANCELED - DEFENSE COUNSEL WILL NOT PRODUCE WITNESSES Omaha Eidelman - 2 days = insufficient notice	Day #190 24
Day #191 25	Day #192 26	Day #193 27 PLAINTIFF'S REPLY FOR 12(c) DUE AND FILED	Day #194 28			

GILIAN COOPER OUT OF OFFICE 3-16 TO 4-1

GARY EIDELMAN OUT OF THE  
OFFICE 3-11 THROUGH 3-16, 3-23

March 2018

Sun	Mon	Tue	Wed	Thu	Fri	Sat
				Day #195 1	Day #196 2	Day #197 3
Day #198 4	Day #199 5 SHEARER CONTACTS EIDELMAN RE: BISIGNANO DATES - GIVES 30 DAY RESPONSE TIME	Day #200 6 EIDELMAN - NO RESPONSE RE: BISIGNANO	Day #201 7 Magistrate Bloom orders Voycheske depo for March 14 EIDELMAN - NO RESPONSE RE: BISIGNANO	Day #202 8 EIDELMAN - NO RESPONSE RE: BISIGNANO	Day #203 9 EIDELMAN - NO RESPONSE RE: BISIGNANO	Day #204 10 EIDELMAN - NO RESPONSE RE: BISIGNANO
Day #205 11 Eidelman personally needs accommodation - Shearer offers to split depo + use phone/video	Day #206 12 Eidelman rejects compromise - threatens protective order to stop depo b/c he needs 14 days off	Day #207 13 Eidelman instructed Shearer that Cooper could handle Barger's case while he was out - Cooper constantly 'out of office' EIDELMAN - NO RESPONSE RE: BISIGNANO	Day #208 14 Plaintiff grants Defense counsels demand Omaha/ Voycheske depo canceled EIDELMAN - NO RESPONSE RE: BISIGNANO	Day #209 15 EIDELMAN - NO RESPONSE RE: BISIGNANO	Day #210 16 EIDELMAN - NO RESPONSE RE: BISIGNANO	Day #211 17 EIDELMAN - NO RESPONSE RE: BISIGNANO
Day #212 18 EIDELMAN - NO RESPONSE RE: BISIGNANO	Day #213 19 SHEARER INFORMS EIDELMAN THAT PLAINTIFF = "TOP DOWN" DEPOS SINCE OMAHA WAS TWICE CANCELED - REQUESTS NAMES/ LOCATIONS OF 30 (b)(6) ASAP	Day #214 20 EIDELMAN - NO RESPONSE RE: BISIGNANO	Day #215 21 EIDELMAN - NO RESPONSE RE: BISIGNANO	Day #216 22 EIDELMAN - NO RESPONSE RE: BISIGNANO	Day #217 23 EIDELMAN - NO RESPONSE RE: BISIGNANO	Day #218 24 EIDELMAN - NO RESPONSE RE: BISIGNANO
Day #219 25 EIDELMAN - NO RESPONSE RE: BISIGNANO	Day #220 26 EIDELMAN - NO RESPONSE RE: BISIGNANO	Day #221 27 EIDELMAN - NO RESPONSE RE: BISIGNANO	Day #222 28 EIDELMAN - NO RESPONSE RE: BISIGNANO	Day #223 29 EIDELMAN - NO RESPONSE RE: BISIGNANO	Day #224 30 EIDELMAN - NO RESPONSE RE: BISIGNANO	Day #225 31 EIDELMAN - NO RESPONSE RE: BISIGNANO

# April 2018

Sun	Mon	Tue	Wed	Thu	Fri	Sat
Day #226 1 EIDELMAN - NO RESPONSE RE: BISIGNANO	Day #227 2 EIDELMAN - NO RESPONSE RE: BISIGNANO	Day #228 3 EIDELMAN - NO RESPONSE RE: BISIGNANO	Day #229 4 EIDELMAN - NO RESPONSE RE: BISIGNANO	Day #230 5 EIDELMAN - NO RESPONSE RE: BISIGNANO	Day #231 6 Day 30 since Shearer's request EIDELMAN - NO RESPONSE RE: BISIGNANO	Day #232 7 EIDELMAN - NO RESPONSE RE: BISIGNANO
Day #233 8 EIDELMAN - NO RESPONSE RE: BISIGNANO	Day #234 9 EIDELMAN - NO RESPONSE RE: BISIGNANO	Day #235 10 EIDELMAN PROMISES BISIGNANO FOR MAY 23 OR 24 - SHEARER TAKES MAY 23 Manhattan	Day #236 11 BARGER REQUESTS ATLANTA DEPENDENTS FOR APRIL. EIDELMAN TRIES TO FORCE SHEARER BACK TO OMAHA CLAIMING 30 (b)(6) STATUS FOR VOYCHESKE ET AL	Day #237 12 SHEARER NOTICES BISIGNANO - NO PROTECTIVE ORDER FILED BY EIDELMAN Manhattan	Day #238 13	Day #239 14
Day #240 15	Day #241 16 SHEARER CONFIRMS BISIGNANO AND ADDS JOSH KING FOR MAY 23 WANTS DEFENDANTS MARINO, WHALEN AND ROBIN ORDING MAY 24/25 JOHNSON FOR JUNE OMAHA - TBD	Day #242 17	Day #243 18 EIDELMAN REJECTS MAY 24/25 DISCUSSES MAY 31/JUNE 1 FOR MARINO/ WHALEN/ORDING	Day #244 19 SHEARER ACCEPTS MAY 31- JUNE 1 DATES WANTS 30 (b)(6) IN ATLANTA WEEK OF JUNE 11 OR JUNE 18	Day #245 20 SHEARER WANTS CAGWIN, 30(b)(6) NAMED BY EIDELMAN AND CHARRON APRIL 24-26 AREA CHARRON IS WILLING AND AVAILABLE - EIDELMAN REFUSES Atlanta	Day #246 21
Day #247 22	Day #248 23 SHEARER NOTICES EIDELMAN RE: 30(b)(6) TOPICS FOR JUNE 13	Day #249 24 DEFENDANT CHARRON IS AVAILABLE - EIDELMAN REFUSES Atlanta	Day #250 25 SHEARER NOTICES MARINO, WHALEN, ORDING - NO PROTECTIVE ORDER FILED BY EIDELMAN Brooklyn	Day #251 26 DEFENDANT CHARRON IS AVAILABLE - EIDELMAN REFUSES Atlanta	Day #252 27	Day #253 28
Day #254 29	Day #255 30 A WEEK LATER, EIDELMAN OBJECTS TO EVERY 30(b)(6) TOPIC, BUT NEVER THE DATE					

# May 2018

GARY EIDELMAN OUT OF THE OFFICE - 5-08, 5-15  
 GILLIAN COOPER OUT OF THE OFFICE - 5-17, 5-22 (planned  
 webinar on day of Bisignano prep), 5-23 (despite Bisignano cancellation)

Sun	Mon	Tue	Wed	Thu	Fri	Sat
		Day #256 1	Day #257 2	Day #258 3 SHEARER RESPONDS RE: 30 (b)(6) TOPICS AGREES TO CONFER MAY 10	Day #259 4 EIDELMAN MOVES KING DEPO TO MAY 31, SHEARER AGREES	Day #260 5
Day #261 6	Day #262 7	Day #263 8	Day #264 9	Day #265 10 SHEARER/EIDELMAN CONFER BY PHONE EIDELMAN REJECTS ALL ACCOUNTING SUBJECTS FOR 30(b)(6) DESPITE ARGUING A RIF DEFENSE. EIDELMAN PROMISES THAT BISIGNANO WILL TESTIFY RE: ACCOUNTING AND I.T. - THEN FILES PROTECTIVE ORDER RE: 30 (b)(6) NOT SET UNTIL JUNE 13	Day #266 11 BARGER PULLS 30 (b) (6) TOPICS IN PART DUE TO EIDELMAN'S REPRESENTATIONS THAT BISIGNANO WILL TESTIFY	Day #267 12
Day #268 13	Day #269 14	Day #270 15	Day #271 16	Day #272 17	Day #273 18	Day #274 19
Day #275 20	Day #276 21 AT 3:30 pm CDT, EIDELMAN PROMISED SHEARER THAT HE AND BISIGNANO WOULD ATTEND ON MAY 23. AT 7:30 pm EIDELMAN INFORMED SHEARER THAT THE MEN WOULD NOT BE ATTENDING.	Day #277 22 SHEARER NOTICES 30(b) (6) DEPOSITIONS/TOPICS FOR JUNE 7/8 SINCE BISIGNANO WILL NOT BE PROVIDING THE TESTIMONY EIDELMAN HAD PROMISED Omaha	Day #278 23 BARGER UNEQUIVOCALLY GRANTS BISIGNANO'S REQUEST BISIGNANO'S DEPO CANCELED Manhattan	Day #279 24 EIDELMAN = MAY 30, OR JUNE 6 W/ MAY 31/JUNE 1 SCHEDULED JUNE 6 HE KNOWS HE WILL BE SPEAKING AT A CONFERENCE IN DALLAS. HE ALSO FORCES HIS AGENDA ON BARGER IN THE FORM OF A CRUDE LIST HE CALLS A "CALENDAR"	Day #280 25 BARGER FINDS MAY 30th TO BE ABSURD IF THE CHILD IS INJURED, COMMUNICATES DIRECTLY WITH BISIGNANO, INSISTING THAT BISIGNANO TAKE AT LEAST A WEEK WITH HIS SON	Day #281 26
Day #282 27	Day #283 28 SHEARER INFORMS EIDELMAN AT LENGTH WHICH DATES BARGER AGREES TO. BISIGNANO IS RESCHEDULED FOR JUNE 29 Manhattan	Day #284 29 AT VARIOUS POINTS, EIDELMAN TRIES TO LOCK DOWN SOME REAL DATES, FOR DEFENDANTS JOHNSON AND CHARRON Atlanta	Day #285 30 NO PROTECTIVE ORDER FILED RE: JUNE 7/8	Day #286 31 ROBIN ORDING, JOSH KING AND KAREN WHALEN ARE DEPOSED, NO PROTECTIVE ORDER IS FILED Brooklyn		

print-a-calendar.com

AT NO TIME DOES MR. EIDELMAN OBJECT TO THE DATE OF JUNE 13, EVEN THE PROTECTIVE  
 ORDER HE SOUGHT AND ABANDONED AFTER MISLEADING PLAINTIFF ABOUT MR.  
 BISIGNANO'S TESTIMONY, HAD NO OBJECTION TO THE DATE



# June 2018

GARY EIDELMAN OUT OF THE OFFICE- 6-04 THROUGH 6-07 (apparently speaking at a convention - not in Omaha as Plaintiff expected)

Sun	Mon	Tue	Wed	Thu	Fri	Sat
					Day #287 DEFENDANT MARINO WAS DEPOSED. SHEARER THEN TOLD COOPER AND EIDELMAN 'SEE YOU NEXT WEEK' A CLEAR REFERENCE TO JUNE 7/8 DEPOSITIONS Brooklyn	Day #288 2 Ms.Cooper's Email Replies Out Of Office June 4-June 8
Day #289 3 Ms.Cooper's Email Replies Out Of Office June 4-June 8	Day #290 4	Day #291 5	Day #292 6 SHEARER DRIVES FROM DALLAS TO OMAHA TO TAKE DEPOS	Day #293 7 SHEARER ARRIVES AT NOTICED LOCATION AT 9am - EIDELMAN, COOPER, ET AL ARE NOT THERE SHEARER EMAILS/CALLS EIDELMAN WHO IS ON HIS CELL PHONE - EIDELMAN CONFIRMS NO ONE IS ATTENDING SHEARER GOES ON THE RECORD	Day #294 8 SHEARER ARRIVES AT THE NOTICED LOCATION AGAIN EXACTLY AT 9am - EIDELMAN, COOPER ET AL ARE NOT THERE. SHEARER GOES ON THE RECORD SHEARER NOTICES VOYCHESKE FOR JUNE 13	Day #295 9
Day #296 10	Day #297 11 SHEARER FILES MOTION TO COMPEL	Day #298 12	Day #299 13 DEPOSITION OF JENNIFER VOYCHESKE IS NOTICED TO BEGIN AT 9 am Omaha	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30



GILLIAN COOPER OUT OF THE OFFICE - 6-04 THROUGH 6-08 (apparently not for

the noticed Omaha depositions)

GARY EIDELMAN OUT OF THE OFFICE- 6-04 THROUGH 6-07 (apparently speaking at a convention - not in Omaha as Plaintiff expected), 06-19, 06-20,

06-22

June 2018

Sun	Mon	Tue	Wed	Thu	Fri	Sat
Day #289 Ms.Cooper's Email Replies Out Of Office June 4-June 8	Day #290 4	Day #291 5	Day #292 6 SHEARER DRIVES FROM DALLAS TO OMAHA TO TAKE DEPOS	Day #293 7 SHEARER ARRIVES AT NOTICED LOCATION AT 9am - EIDELMAN, COOPER, ET AL ARE NOT THERE SHEARER EMAILS/CALLS EIDELMAN WHO IS ON HIS CELL PHONE - EIDELMAN CONFIRMS NO ONE IS ATTENDING SHEARER GOES ON THE RECORD	Day #287 1 DEFENDANT MARINO DEPOSED. SHEARER REFERENCES OMAHA DEPOS - SEE YOU NEXT WEEK Brooklyn	Day #288 2 Ms.Cooper's Email Replies Out Of Office June 4-June 8
Day #296 10	Day #297 11 SHEARER FILES MOTION TO COMPEL	Day #298 12 TELEPHONIC HEARING - 3:30 pm EST Magistrate Bloom denies Plaintiff's Motion to Compel	Day #299 13 DEPOSITION OF JENNIFER VOYCHESKE IS NOTICED TO BEGIN AT 9 am Omaha - CANCELLED	Day #300 14 EIDELMAN CONTACTS SHEARER REQUESTING PLAINTIFF CHOOSE DEPO DATES FROM DEFENDANTS "CALENDAR"	Day #301 15 PLAINTIFF CHOOSES DEPO DATES - SHEARER INFORMS EIDELMAN OF DATES PLAINTIFF IS UNAVAILABLE	Day #302 16 EIDELMAN RESPONDS SARCASTICALLY THAT JULY 4 IS NOT AVAILABLE DESPITE BEING ON DEFENDANT'S CALENDAR CHANGES TO JULY 5 KNOWING PLAINTIFF IS UNAVAILABLE
Day #303 17 SHEARER RESPONDS - PLAINTIFF RELIED ON DEFENDANTS CALENDAR AND DEPOS CAN AND WILL OCCUR JULY 4 Omaha	Day #304 18 SHEARER PROVIDES EIDELMAN STATEMENT FOR ROSMAN -IF ROSMAN SIGNS SHEARER WILL CANCEL DEPO Manhattan	Day #305 19 Omaha EIDELMAN AND SHEARER DISCUSS POSSIBLE CHANGES TO JULY 4 PENDING PLAINTIFFS AVAILABILITY - EIDELMAN NEVER SEEKS PROTECTIVE ORDER FOR ROSMAN	Day #306 20 Omaha	Day #307 21 Omaha	Day #308 22 ROSMAN - NO SHOW PLAINTIFF DECIDES TO WAIT ON SERVICE OF METLIFE SUBPOENA DUE TO EIDELMAN'S OBJECTION Manhattan	Day #309 23 EIDELMAN NEVER REMOVES OBJECTION TO SERVICE OF METLIFE - COOPER FORWARDS PLAINTIFFS INTENT TO SERVE SUBPOENA TO METLIFE IN ITS ENTIRETY. METLIFE CONTACTS SHEARER BELIEVING THEY'VE BEEN SERVED
Day #310 24	Day #311 25 DEFENDANT'S SCHEDULED DEPOSITIONS - KENNEDY DEPOS DR/NURSE EIDELMAN NO SHOWS OWN WITNESS Atlanta /Cincinnati	Day #312 26 CAGWIN 30(b)(6) DEPO - 9am CHARRON DEPO 12pm-5pm Atlanta	Day #313 27 JOHNSON DEPO - 9am-5pm Atlanta	Day #314 28 Atlanta	Day #315 29 BISIGNANO DEPOSITION - RESCHEDULE 9am-5pm Manhattan	Day #316 30 Day #316 .



# July 2018

Sun	Mon	Tue	Wed	Thu	Fri	Sat
Day #317 1	Day #318 2 SHEARER CONTACTS EIDELMAN RE: JACKSON DEPO - EIDELMAN SAYS FIRST DATA REFUSES TO PRODUCE HIM	Day #319 3 SHEARER ARRIVES AT 11AM FOR EJ JACKSON DEPO - NO SHOW  Palo Alto	Day #320 4 EIDELMAN CONTACTS SHEARER VIA EMAIL DESPITE CLAIMS OF BEING UNAVAILABLE FOR WORK ON JULY 4 - REFUSES TO DELEGATE 30(b)(6) SHEARER NOTICES VOYCHESKE AS FACT WITNESS ONLY - withdraws Plumeri depo notice - Amends 26(a) Disclosure	Day #321 5 EIDELMAN ATTEMPTS TO NOTICE BARGER DEPO FOR JULY 20 - SHEARER OBJECTS SUGGESTS JULY 27 - EIDELMAN ATTEMPTS TO CLAIM VOYCHESKE AS 30(b)(6) - SHEARER CLAIMS JULY 23 AS FACT ONLY	Day #322 6	Day #323 7
Day #324 8	Day #325 9 METLIFE SERVED SUBPOENA	Day #326 10 COOPER NOTICES BARGER DEPO - AUGUST 10 / SHEARER NOTICES 30(b) (6) DEPOS - JULY 30-31  Manhattan/Brooklyn	Day #327 11	Day #328 12	Day #329 13	Day #330 14
Day #331 15	Day #332 16	Day #333 17 EIDELMAN FILES SECOND VOYCHESKE DECLARATION - SHEARER RESPONDS - JUDGE BLOCK DENIES PLAINTIFF'S 12C MOTION	Day #334 18	Day #335 19 PLUMERI DEPOSITION CANCELED  Manhattan	Day #336 20 PLAINTIFF CANCELS VOYCHESKE DEPOSITION	Day #337 21
Day #338 22	Day #339 23 VOYCHESKE DEPOSITION NOTICED - 9 AM - 5 PM - [FACT ONLY] Omaha CANCELED	Day #340 24	Day #341 25	Day #342 26	Day #343 27 METLIFE DEPO DATE DISCARDED - EIDELMAN REFUSES TO SHOW FOR 30(b)(6) - PLAINTIFF CANCELS Brooklyn	Day #344 28
Day #345 29	Day #346 30 30 (B)(6) DEPOS NOTICED - JULY 10 CANCELED Brooklyn	Day #347 31 CANCELED Brooklyn				

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK

STEVEN B. BARGER, an individual, ) Case No.:1:17-CV-4869  
)  
Plaintiff, )  
) STATEMENT ON THE  
vs. )  
) RECORD  
FIRST DATA CORPORATION, et al, )  
)  
Defendants. )

DATE: June 7, 2018

TIME: 9:00 a.m.

PLACE: Regus 1299 Farnam Street, Suite 300, Omaha,  
Nebraska

Job No. 28252



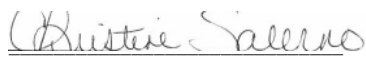
STEVEN B. BARGER -against- FIRST DATA  
Data First on June 07, 2018

Job 28252  
Pages 2..5

Page 2	Page 3
<p>(402) 476-1153 A P P E A R A N C E S</p> <p>APPEARING ON BEHALF OF PLAINTIFF:</p> <p>Mr. Shawn E. Shearer Attorney at Law THE LAW OFFICE OF SHAWN SHEARER, P.C. 3839 McKinney Avenue, Suite 155-254 Dallas, Texas 75204 (972)803-4499 shawn@shearerlaw.pro</p> <p>APPEARING ON BEHALF OF DEFENDANTS:</p> <p>Mr. Gary B. Eidelman Attorney at Law SAUL EWING ARNSTEIN &amp; LEHR LLP Lockwood Place 500 East Pratt Street Baltimore, Maryland 21202-3133 (410)332-8975 gary.eidelman@saul.com</p> <p>ALSO PRESENT: Anna Grady, Videographer and Brenda Barger</p>	<p>I N D E X</p> <p>EXHIBITS: Marked</p> <p>50 - Multi-page document 4</p>
Page 4	Page 5
<p>(Whereupon, at 9:30 a.m., the following proceedings were had:)</p> <p>(Exhibit No. 50, marked for identification.)</p> <p>VIDEOGRAPHER: Good morning. We are on the record at 9:30 a.m. on Thursday, June 7th, 2018, for the videotaped deposition of First Data Corporation, 30(b)(6).</p> <p>We are taking this deposition at the offices of Regus in Omaha, Nebraska, in the action entitled Steven B. Barger versus First Data Corporation, et al.</p> <p>This is taken before Christine Salerno.</p> <p>This is Case No. 17, CV, 4869. My name is Anna Grady. I'm a certified legal video specialist from EcoScribe solutions.</p> <p>This is Disc No. 1. Would counsel please identify themselves and state whom they represent.</p> <p>MR. SHEARER: This is Shawn Shearer, plaintiff's counsel for Mr. Steven B. Barger. And with me is Brenda Barger, my paralegal. We'll proceed.</p> <p>My name is Shawn Barger. I'm joined by</p>	<p>Brenda Barger, my paralegal. This was to be a Rule 30(b)(6) deposition of First Data corporation. In addition, there was an agreement with counsel Gary idle man that the testimony of Jennifer Voycheske as a 30(b)(6) witness may also be designated as a fact witness under Rule 30.</p> <p>It's now 9:32 a.m. on May -- on June 7th and no one has appeared from First Data. No witnesses from First Data. Mr. Eidelman is not here. Ms. Gillian Cooper is not here. None of the counsel for First Data are present.</p> <p>We'll go off the record here in a moment for a -- 15 minutes to give the deponent, or his counsel, a bit more time; however, that is not necessary. I e-mailed Mr. Eidelman this morning, about 20 minutes ago, to indicate that we were here in Omaha at the noticed place for the deposition. Mr. Eidelman e-mail returned an out of office. I telephoned Mr. Eidelman, he indicated he was not going to be here and made some claims about indicating that he was not -- that he had indicated he was not going to attend. Those communications are not in my recollection and are not in my records.</p>

STEVEN B. BARGER -against- FIRST DATA  
Data First on June 07, 2018

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Pages 6..9

<p style="text-align: right;">Page 6</p> <p>1 I'm going to enter into the record Exhibit 2 No. 50 in this case which contains an e-mail 3 from me to miss -- Mr. Eidelman, Ms. Cooper and 4 associate with the same firm, Ms. Lindsay 5 Kennedy, with a CC to David Zeitlin, local 6 counsel on this case in New York, dated 7 May 22nd, 2018, at 2:51. The e-mail states: 8 "Please see the attached letter and notice of 9 30(b)(6) deposition for Omaha." 10 The letter is also included. The letter is 11 approximately two pages long and it specifies 12 the dates for these depositions to occur under 13 Rule 30(b)(6) in Omaha today at 9 a.m. at this 14 location. 15 Also attached to the letter is the notice of 16 Rule 30(b)(6) deposition and I'm going to read 17 that into the record and this is in Barger V 18 First Data, Case No. 1:17-CV-4869, pending in 19 the Eastern District of New York, captioned 20 Steven B. Barger plaintiff V. First Data 21 Corporation, et al, defendants, and it states: 22 "Notice of Rule 30(b)(6) deposition and 23 provides, Please take notice that pursuant to 24 Rules 30(b)(6) of the Federal Rules of Civil 25 Procedure, the plaintiff in the above captioned</p>	<p style="text-align: right;">Page 7</p> <p>1 case will take the oral depositions under oath 2 of First Data corporation through one or more 3 officers, directors, agents or other 4 representatives who shall be designated to 5 testify on First Data's behalf regarding all 6 information known or reasonably available to 7 First Data with respect to the subject matter 8 identified in Exhibit A. Plaintiff requests 9 that First Data provide notice of at least five 10 business dates, before the deposition, of the 11 names and employment positions of the 12 individuals designated to testify on First 13 Data's behalf. This deposition shall commence 14 at 9 a.m. on June 7, 2018, to continue beginning 15 at 9 a.m. on June 8, 2018, if needed, at Regus 16 1299 Farnam Street, Suite 300, Omaha, Nebraska, 17 68102; or such other time and location as agreed 18 by the parties, and it shall be taken before a 19 duly certified court reporter and notary public 20 or other person authorized to administer oaths. 21 The depositions will be recorded by stenographic 22 and video means. Dated May 22, 2018. The law 23 office of Shawn Shearer, PC and then my 24 signature with my telephone number and contact 25 information.</p>
<p style="text-align: right;">Page 8</p> <p>1 And I would like to enter that into the 2 record and we'll take a -- go off the record for 3 15 minutes, we'll come back to see if they show. 4 Off the record. 5 VIDEOGRAPHER: Please stand by as 6 we go off the record. The time is approximately 7 9:37 a.m. 8 (Recess was taken.) 9 VIDEOGRAPHER: We are back on the 10 record. The time is approximately 9:54 a.m. 11 MR. SHEARER: Shawn Shearer again, 12 representing plaintiff Barger in Barger V. First 13 Data. The citation was given before. 14 It is now 9:54 a.m. No witnesses are here 15 for the defendant First Data. Counsel for First 16 Data is not present at the noticed address. 17 At this time, we're going to suspend the 18 deposition and proceed accordingly with defense 19 counsel. That is it, off the record. 20 VIDEOGRAPHER: Please stand by as 21 we go off the record. This is the end of disc 22 one, the time is approximately 9:54 a.m. 23 (Concluded at 9:54 a.m.) 24 25</p>	<p style="text-align: right;">Page 9</p> <p>1 C E R T I F I C A T E 2 3 I, Christine M. Salerno, RPR, do hereby certify 4 that the within and following complete transcript 5 contains all the evidence requested to be transcribed 6 by me, from the proceedings had in or at the trial of 7 the foregoing cause in said court; and that said 8 complete transcript is a correct and complete 9 transcription of the evidence requested to be 10 transcribed from the record made at the time of said 11 proceedings or trial. 12 Dated this 11th day of June, 2018. 13 14  15 16 Christine M. Salerno, RPR 17 18 19 20 21 22 23 24 25</p>

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE EASTERN DISTRICT OF NEW YORK

3 STEVEN B. BARGER, an individual,) Case No.: 1:17-CV-4869

4 Plaintiff, )

5 vs. )

6 FIRST DATA CORPORATION, et al, )

7 Defendants. )

TELEPHONIC STATEMENT

ON THE RECORD

8  
9  
10  
11  
12 DATE: June 8, 2018

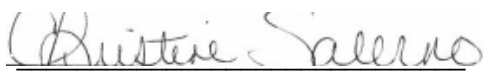
13 TIME: 9:02 a.m.

14 PLACE: Regus 1299 Farnam Street, Suite 300, Omaha,  
15 Nebraska

16  
17  
18  
19  
20  
21  
22  
23  
24 Job No. 28253  
25

STEVEN B. BARGER -against- FIRST DATA  
First Data on June 08, 2018

Job 28253  
Pages 2..5

<p style="text-align: right;">Page 2</p> <p><b>1 APPEARANCES</b></p> <p><b>2</b></p> <p><b>3</b> APPEARING ON BEHALF OF PLAINTIFF:</p> <p><b>4</b> Mr. Shawn E. Shearer - VIA TELEPHONE</p> <p><b>5</b> Attorney at Law</p> <p><b>6</b> THE LAW OFFICE OF SHAWN SHEARER, P.C.</p> <p><b>7</b> 3839 McKinney Avenue, Suite 155-254</p> <p><b>8</b> Dallas, Texas 75204</p> <p><b>9</b> (972)803-4499</p> <p><b>10</b> shawn@shearerlaw.pro</p> <p><b>11</b> APPEARING ON BEHALF OF DEFENDANTS:</p> <p><b>12</b> Mr. Gary B. Eidelman - NOT PRESENT</p> <p><b>13</b> Attorney at Law</p> <p><b>14</b> SAUL EWING ARNSTEIN &amp; LEHR LLP</p> <p><b>15</b> Lockwood Place</p> <p><b>16</b> 500 East Pratt Street</p> <p><b>17</b> Baltimore Maryland 21202-3133</p> <p><b>18</b> (410)332-8975</p> <p><b>19</b> gary.eidelman@saul.com</p> <p><b>20</b> (Court reporter took statement via speaker phone.)</p> <p><b>21</b> ALSO PRESENT: Brenda Barger - VIA TELEPHONE</p> <p><b>22</b></p> <p><b>23</b></p> <p><b>24</b></p> <p><b>25</b></p>	<p style="text-align: right;">Page 3</p> <p><b>1</b> (Whereupon, at 9:00 a.m., the following proceedings</p> <p><b>2</b> were had:)</p> <p><b>3</b> MR. SHEARER: I am Shawn Shearer</p> <p><b>4</b> of the Law Office of Shawn Shearer, P.C.,</p> <p><b>5</b> counsel for the plaintiff, Steven Barger, in the</p> <p><b>6</b> case of Steven Barger V. First Data Corporation,</p> <p><b>7</b> et al. Case No. 1:17-CV-4869, pending in the</p> <p><b>8</b> Federal District Court for the Eastern District</p> <p><b>9</b> of New York.</p> <p><b>10</b> It is 9 a.m. on June 8, 2018. I am at the</p> <p><b>11</b> Regus offices located at 1299 Farnam Street,</p> <p><b>12</b> Suite 300, Omaha, Nebraska.</p> <p><b>13</b> This is the time and place for the second</p> <p><b>14</b> day of the Rule 30(b)(6) depositions of the</p> <p><b>15</b> defendant First Data.</p> <p><b>16</b> As like yesterday, June 7th, 2018, neither</p> <p><b>17</b> representatives of First Data, nor counsel for</p> <p><b>18</b> First Data, have appeared here at this date and</p> <p><b>19</b> time period for those depositions.</p> <p><b>20</b> The notice of Rule 30(b)(6) depositions was</p> <p><b>21</b> served on counsel for First Data on May 22,</p> <p><b>22</b> 2018, and that notice is included as Exhibit 50</p> <p><b>23</b> to the transcript of June 7, 2018.</p> <p><b>24</b> Because witnesses for First Data have not</p> <p><b>25</b> appeared at the designated time and place, these</p>
<p style="text-align: right;">Page 4</p> <p><b>1</b> depositions are again suspended. That is it, we</p> <p><b>2</b> can go Off the record.</p> <p><b>3</b> (Discussion off the record.)</p> <p><b>4</b> Also note that my paralegal Brenda Barger is</p> <p><b>5</b> here with me.</p> <p><b>6</b> (Concluded at 9:03 a.m.)</p> <p><b>7</b></p> <p><b>8</b></p> <p><b>9</b></p> <p><b>10</b></p> <p><b>11</b></p> <p><b>12</b></p> <p><b>13</b></p> <p><b>14</b></p> <p><b>15</b></p> <p><b>16</b></p> <p><b>17</b></p> <p><b>18</b></p> <p><b>19</b></p> <p><b>20</b></p> <p><b>21</b></p> <p><b>22</b></p> <p><b>23</b></p> <p><b>24</b></p> <p><b>25</b></p>	<p style="text-align: right;">Page 5</p> <p><b>1</b> C E R T I F I C A T E</p> <p><b>2</b></p> <p><b>3</b> I, , do hereby certify</p> <p><b>4</b> that the within and following complete transcript</p> <p><b>5</b> contains all the evidence requested to be transcribed</p> <p><b>6</b> by me, from the proceedings had in or at the trial of</p> <p><b>7</b> the foregoing cause in said court; and that said</p> <p><b>8</b> complete transcript is a correct and complete</p> <p><b>9</b> transcription of the evidence requested to be</p> <p><b>10</b> transcribed from the record made at the time of said</p> <p><b>11</b> proceedings or trial.</p> <p><b>12</b> Dated this 11th day of June, 2018.</p> <p><b>13</b></p> <p><b>14</b> </p> <p><b>15</b></p> <p><b>16</b></p> <p><b>17</b></p> <p><b>18</b></p> <p><b>19</b></p> <p><b>20</b></p> <p><b>21</b></p> <p><b>22</b></p> <p><b>23</b></p> <p><b>24</b></p> <p><b>25</b></p>



IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----  
STEVEN B. BARGER, an individual

Plaintiff,

vs.

Index No.  
1:17-CV-  
4869

FIRST DATA CORPORATION, et al,

Defendants.  
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STATEMENT ON THE RECORD

New York, New York

Friday, June 22, 2018

Reported by:  
Jeremy Frank, MPM  
JOB NO. 28285

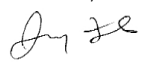
STEVEN B. BARGER -against- FIRST DATA  
Statement On the Record on June 22, 2018 Certificate of Non-Appearance

Job 28285  
Pages 2..5

<div>1</div> <div>2</div> <div>3</div> <div>4</div> <div>5</div> <div>6</div> <div>7</div> <div>8</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div>	<div>Page 2</div> <div>June 22, 2018</div> <div>9:19 a.m.</div> <div>Statement on the record, held at the</div> <div>offices of Regus, 100 Church Street, New York,</div> <div>New York, before Jeremy Frank, a Notary Public</div> <div>of the State of New York.</div>									
<div>1</div> <div>2</div> <div>3</div> <div>4</div> <div>5</div> <div>6</div> <div>7</div> <div>8</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div>	<div>Page 3</div> <div>A P P E A R A N C E S:</div> <div>ZEITLIN &amp; ZEITLIN, P.C.</div> <div>Attorneys for Plaintiff</div> <div>50 Court Street, Suite 506</div> <div>Brooklyn, NY 11201</div> <div>BY: DAVID A. ZEITLIN, ESQ., of counsel</div> <div>David@Zeitlinlawfirm.com</div> <div>(718) 596-6815</div>									
<div>1</div> <div>2</div> <div>3</div> <div>4</div> <div>5</div> <div>6</div> <div>7</div> <div>8</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div>	<div>Page 4</div> <div>I N D E X</div> <table><tr><th>EXHIBIT</th><th>DESCRIPTION</th><th>PAGE</th></tr><tr><td>Plaintiff's Exhibit 1</td><td>Notice for Adam Rosman</td><td>7</td></tr><tr><td>Plaintiff's Exhibit 2</td><td>Unsigned declaration of Adam Rosman</td><td>7</td></tr></table>	EXHIBIT	DESCRIPTION	PAGE	Plaintiff's Exhibit 1	Notice for Adam Rosman	7	Plaintiff's Exhibit 2	Unsigned declaration of Adam Rosman	7
EXHIBIT	DESCRIPTION	PAGE								
Plaintiff's Exhibit 1	Notice for Adam Rosman	7								
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<div>1</div> <div>2</div> <div>3</div> <div>4</div> <div>5</div> <div>6</div> <div>7</div> <div>8</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div>	<div>Page 5</div> <div>MR. ZEITLIN: My name is David</div> <div>Zeitlin of Zeitlin &amp; Zeitlin, P.C. We</div> <div>represent the plaintiffs in the case of</div> <div>Barger versus First Data Corporation, et</div> <div>al. This was to be the deposition of</div> <div>Adam Rosman, the executive vice</div> <div>president, general counsel and secretary</div> <div>of First Data Corporation pursuant to</div> <div>Rule 30 of the Federal Rules of Civil</div> <div>Procedure in Civil Case number</div> <div>117-CV-04869 pending in the Federal</div> <div>District for the Eastern District of New</div> <div>York.</div> <div>It is now 20 after 9:00 on June</div> <div>22nd, and neither Mr. Rosman nor the</div> <div>defendants' counsel have appeared. We</div> <div>will go off the record for 10 or 15</div> <div>minutes to give the deponent and his</div> <div>counsel a little bit more time.</div> <div>(Whereupon, an off-the-record</div> <div>discussion was held.)</div> <div>(Time noted: 9:20 a.m.)</div> <div>(Time noted: 9:32 a.m.)</div> <div>MR. ZEITLIN: We are back on the</div>									

STEVEN B. BARGER -against- FIRST DATA  
Statement On the Record on June 22, 2018 Certificate of Non-Appearance

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<p style="text-align: right;">Page 6</p> <p>1 2 record. 3 It is now 9:32 on June 22nd, 2018, 4 and Mr. Rosman and his counsel still have 5 not appeared at the designated time and 6 location for Mr. Rosman's deposition. 7 This deposition was properly noticed and 8 served on June 8th, 2018 by e-mail from 9 plaintiff's counsel to the ECF e-mail 10 addresses for defense counsel, namely Mr. 11 Gary Eidelman, Ms. Gillian Cooper, and 12 Ms. Lindsey Kennedy. 13 The notice of deposition provided 14 that Mr. Rosman's deposition was to occur 15 here at 100 Church Street on the eighth 16 floor, New York City, New York 10007 17 beginning at 9:00 a.m. on June 22nd, 18 2018. Defense counsel has indicated in 19 writing several times after service of 20 this notice that Mr. Rosman would not be 21 appearing. Plaintiff's counsel offered 22 for Mr. Rosman to execute a sworn 23 declaration in lieu of appearance. 24 Defense counsel refused for Mr. Rosman to 25 execute a sworn deposition in lieu of his</p>	<p style="text-align: right;">Page 7</p> <p>1 2 appearance here today. 3 No motion for protective order has 4 been filed with the court seeking to halt 5 this deposition as noticed. A true and 6 correct copy of the notice of intention 7 to take oral deposition of Mr. Rosman and 8 certificate of service will be included 9 as Plaintiff's Exhibit 51 attached to 10 this transcript. 11 (Plaintiff's 51, Notice for Adam 12 Rosman, marked for identification, as of 13 this date.) 14 MR. ZEITLIN: A true and correct 15 copy of the form of declaration plaintiff 16 requested that Mr. Rosman complete and 17 sign in lieu of providing deposition 18 testimony today will be marked as 19 Plaintiff's Exhibit 52. 20 (Plaintiff's 52, Unsigned 21 declaration of Adam Rosman, marked for 22 identification, as of this date.) 23 MR. ZEITLIN: Defense counsel 24 refused to provide the written 25 declaration of Mr. Rosman in lieu of this</p>
<p style="text-align: right;">Page 8</p> <p>1 2 deposition. It is now 9:34 and deponent 3 and counsel have still not appeared. 4 This deposition is suspended due to 5 nonappearance. 6 We can go off the record. 7 (Whereupon, an off-the-record 8 discussion was held.) 9 (Time noted: 9:34 a.m.) 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">Page 9</p> <p>1 2 C E R T I F I C A T E 3 STATE OF NEW YORK ) 4 : ss. 5 COUNTY OF NEW YORK ) 6 7 I, Jeremy Frank, a Notary Public within 8 and for the State of New York, do hereby 9 certify: 10 That, the proceedings was duly reported 11 by me and that such deposition is a true 12 record of the testimony given by the parties. 13 I further certify that I am not related 14 to any of the parties to this action by blood 15 or marriage, and that I am in no way 16 interested in the outcome of this matter. 17 IN WITNESS WHEREOF, I have hereby 18 set my hand on the 22nd day of June, 2018. 19 20 21 22 23 24 25</p> <p style="text-align: center;">   <hr style="width: 100px; margin: 0 auto;"/>  JEREMY FRANK, MPM </p>

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE EASTERN DISTRICT OF NEW YORK  
3

4           STEVEN B. BARGER, an  
5           individual,

6                               Plaintiff,

7           vs.

Case No.: 1:17-cv-4869

8           FIRST DATA CORPORATION,  
9           et al.,

10                              Defendants.  
11           \_\_\_\_\_ /

12  
13  
14                               STATEMENT ON THE RECORD  
15  
16

17           Date:                   Tuesday, July 3, 2018  
18

19           Time:                   11:27 a.m.  
20

21           Location:               Regus  
22                                    2100 Geng Road, Suite 210  
23                                    Palo Alto, California 94303

24           Job No. 28400

25           Taken before:           AUDREY L. PHILIPPE, CSR 13288

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STEVEN B. BARGER -against- FIRST DATA  
 Proceedings on July 03, 2018 Certificate of Non-Appearance

Job 28400  
 Pages 2..5

<div>1A P P E A R A N C E S</div> <div>2</div> <div>3SHAWN E. SHEARER, ESQ., The Law Office of Shawn</div> <div>4Shearer, P.C., 3839 McKinney Avenue, Suite 155-254,</div> <div>5Dallas, Texas 75204, 972-803-4499, appeared as counsel</div> <div>6on behalf of the Plaintiff.</div> <div>7</div> <div>8---o0o---</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16E X H I B I T S</div> <div>17</div> <div>18EXHIBITDESCRIPTIONPAGE</div> <div>19Exhibit 1Notice of Intention to Take4</div> <div>20Oral Deposition of EJ Jackson;</div> <div>21Certificate of Service</div> <div>22(3 pages)</div> <div>23</div> <div>24</div> <div>25</div> <div>26</div> <div>27</div> <div>28</div> <div>29</div> <div>30</div> <div>31</div> <div>32</div> <div>33</div> <div>34</div> <div>35</div> <div>36</div> <div>37</div> <div>38</div> <div>39</div> <div>40</div> <div>41</div> <div>42</div> <div>43</div> <div>44</div> <div>45</div> <div>46</div> <div>47</div> <div>48</div> <div>49</div> <div>50</div> <div>51</div> <div>52</div> 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